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October 7, 2016

*VIA ECF*

OUR FILE NO. 374254-000007

Honorable Steven C. Mannion, U.S.M.J.  
United States District Court  
Martin Luther King Building and U.S. Courthouse  
50 Walnut Street, Court Room MLK 2B  
Newark, New Jersey 07101

**Re: *Immunomedics, Inc. v. Roger Williams Medical Center, et al.***  
**Case No. 2:15-cv-04526-JLL-SCM**

Dear Judge Mannion:

I write on behalf of Plaintiff Immunomedics, Inc. ("Plaintiff") in the above-referenced matter and with the consent of Defendants Roger Williams Medical Center, Steven C. Katz, M.D. and Richard P. Junghans, M.D., Ph.D. (collectively, "Defendants"). In anticipation of the telephonic status conference scheduled for Tuesday, October 11, 2016 at 10:30 a.m. (Dkt. No. 49), I write to inform Your Honor that Defendants have withdrawn their objections to Plaintiff's proposed Third Amended Complaint, mooted Plaintiff's request for leave to file a motion to amend. (See Dkt. Nos. 67 and 70; see also Fed. R. Civ. P. 15(a)(2)).

The Parties have conferred and respectfully submit for Your Honor's consideration the following timeline for filing and responding to the Third Amended Complaint:

- October 14, 2016: Deadline to file the Third Amended Complaint; and
- November 14, 2016: Deadline for Defendants to answer or otherwise respond to the Third Amended Complaint.

Furthermore, the fact discovery deadline is currently set for December 9, 2016. (ECF No. 31 at ¶ 16). In order to accommodate additional discovery to be taken in response to the Third Amended Complaint, Defendants consent to Plaintiff's request for a three-month extension of the fact discovery deadline to March 9, 2017.

If acceptable, the Parties respectfully request that Your Honor "So Order" this letter to (i) set the above deadlines for filing and responding to the Third Amended Complaint and (ii) amending Paragraph 16 of the Pretrial Scheduling Order to set a fact discovery deadline of March 9, 2017.



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The Parties look forward to discussing this matter with Your Honor during the telephonic status conference.

Respectfully,

s/ Steven R. Marino  
Steven R. Marino

cc: All Counsel (Via ECF Notification)

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